

Before The
FEDERAL COMMUNICATIONS COMMISSION
 WASHINGTON, D.C.

In the matter of:)	MB Docket 02-208
Amendment of §73.202 of the)	RM-10515
Commission's Rules - Table of)	(Buttonwillow, CA)
Allotments for FM Broadcast Stations)	



COMMENTS OF REC NETWORKS

1. REC Networks ("REC") is a supporter of locally owned and diverse radio. REC currently operates several Internet only radio stations. REC also operates several websites including the original LPFM Channel Search Tool. REC Networks also represents the interests of independently owned Low Power FM ("LPFM") broadcast stations and their listeners. Since the above captioned proceeding will have an impact on the future of local radio in REC's area of interest¹, REC will review the proposal and provide the results of our research. REC has no plans to apply for the channel.

2. REC has reviewed the petition by Dangerous Broadcasting LP II ("petitioner") to amend the Table of Allotments to add Channel 265A to Buttonwillow, CA. REC confirms the petitioner's statements² about the businesses within the community as well as the Buttonwillow School and the Buttonwillow Chamber of Commerce³.

3. Buttonwillow receives telephone service from Verizon-California and has it's own telephone exchange⁴ and rate center. Buttonwillow is a long distance call to county seat Bakersfield. REC was able to identify over 40 business in the community that have "Buttonwillow" in the listed name⁵.

4. The proposed allotment's city-grade contour does not encompass any urbanized area and the service contour encompasses less than 10% of the Bakersfield urbanized area therefore REC

1 - REC's "Area of Interest" include the entire states of Arizona and Nevada as well as the Southern California counties of Kern, Los Angeles, Inyo, San Bernardino, Ventura, Riverside, Orange, San Diego and Imperial.

2 - See Appendix, REC's Allotment Analysis for Buttonwillow, CA.

3 - Petition at 1.

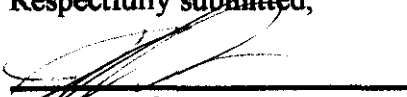
4 - BTNWCAXFRS3.

does not feel that this allotment is an attempt to add another station to the Bakersfield market and therefore a *Tuck* analysis is not necessary in this case. 6 FM stations including only one from Bakersfield provide 60dBu service over Buttonwillow including one providing city grade coverage.

5. In the community of Buttonwillow, there are currently 7 possible channels where an LP-100 station can be placed in the community fully spaced to other stations. If this allotment is granted, 5 channels will remain available⁶. REC is aware that there is one LPFM application on Channel 265L1 in Bakersfield that would be short spaced as a result of this allotment. That LPFM application was filed prior to the Second Report and Order of MM Docket 99-25 which instituted third adjacent channel protection. Therefore, the LPFM application in Bakersfield is short spaced on the third adjacent channel making the LPFM issue moot.

6. Based on the information provided by the petitioner and REC's independent research, we have concluded that Buttonwillow is independent from county seat Bakersfield and that grant of the Buttonwillow allotment will not have a significant influence in the Bakersfield radio market and there is no threat to the future of the LPFM service in Buttonwillow by the grant of this allotment. REC therefore feels that this allotment is in the public interest and we urge the Commission to **GRANT** this petition.

Respectfully submitted,



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5 - Source: Superpages.com, the on-line white pages operated by Verizon, the local telephone company in Buttonwillow. REC feels that the more businesses and organizations with the community name in the business name, the more significant the community would be for allotment purposes.

6 - Additional LPFM channels are available that meet the minimum required spacing but may be subject to interference from other full power stations.

CERTIFICATE OF SERVICE

REC has served a copy of these comments via US Mail upon the petitioner:

**Dangerous Broadcasting LP II
John J McVeigh, Atty.
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Columbia, MD 21044-2787**